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April 24, 2008

By Hand

Honorable George B. Daniels
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 630
New York, New York 10007

SO ORDERED

George B. Daniels
HON. GEORGE B. DANIELS

APR 20 2008

Re: Mansel Oil Limited v. Swift Aviation Group, Inc.
08 CV 1086 (GBD)
Our Ref.: 129053-00601

Dear Judge Daniels:

We represent Plaintiff Mansel Oil Limited. We write with the consent of Defendant Swift Aviation Group, Inc. with respect to the scheduling of Plaintiff's motion and Defendant's cross-motion which are pending before the Court.

On April 4, Plaintiff moved for leave to file an amended complaint and associated relief regarding a "Rule B" attachment ("Motion"). Defendant's opposition papers were due on April 21, and Plaintiff's reply papers were due on the return date of April 28.

On April 21, Defendant served its papers in opposition to the Motion and made a cross-motion to stay the action pending the outcome of an arbitration in London between Plaintiff and Defendant ("Cross-Motion"). Defendant did not state a return date in its Cross-Motion.

Also, soon after the filing of the Complaint, on February 5, 2008, the Court issued a scheduling order calling for a pretrial conference on May 1.

The parties have conferred and believe that it makes the most sense for the Plaintiff's Motion and Defendant's Cross-Motion to be decided together and also that the May 1 pretrial conference should be adjourned pending the Court's action on the Motion and Cross-Motion.

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Accordingly, the parties respectfully propose the following schedule for the Court's consideration:

1. The May 1 pretrial conference and associated scheduling order be adjourned without date pending the Court's action on the Motion and Cross-Motion.
2. Plaintiff's reply papers in support of the Motion and its papers in opposition to the Cross-Motion be submitted on or before May 1.
3. Defendant's reply papers in support of the Cross-Motion be submitted on or before May 9.
4. Pursuant to the Court's Individual Practice 2E, both parties request oral argument, and, if the Court agrees, that oral argument be heard at any time convenient to the Court and parties on or after May 13.

We are of course at the Court's disposal to respond to any questions in person or by telephone and thank the Court in advance for its consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "LeRoy Lambert".

LeRoy Lambert

LRL/cn

cc: **By Email**

Skadden, Arps, Slate, Meagher & Flom LLP

Attention: Julie Bédard (julie.bédard@skadden.com)